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U.S. DISTRICT COURT, E.D.N.Y.

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★ DEC 28 2005 ★

December 21, 2005

By Fax: 718: 260-2386

Honorable Allyne R. Ross
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

BROOKLYN OFFICE

Handwritten:
S. Allyne Ross
12/22/05

s/Allyne Ross

Re: United States v. Christopher Gill,
05 Cr. 0842 (S-1) (ARR)

Handwritten:
cc: Counsel
DTSO's

Dear Judge Ross:

I am assigned to represent defendant Christopher Gill in the above-referenced matter. This letter is an application for the following relief:

1. That Mr. Gill be given an extra week within which to post the property which is to secure his bail bond; and
2. That the Court grant Mr. Gill a temporary suspension of his electronic monitoring requirement so that he can spend the Christmas weekend with his parents in New Jersey.

Mr. Gill was arrested on December 13, 2005 and was released on a \$300,000 personal recognizance bond to be cosigned by two financially responsible persons and secured by one piece of property. Both his parents, Elaine Gill and William Gill cosigned the bond on Thursday, December 15, 2005. His parents are also posting their home in Old Bridge, New Jersey as collateral for the bond. They have already executed the Affidavit of Confession of Judgment and returned the document to me. However, because of the subway strike, the process of getting the document signed by AUSA Scott Morvillo, returned to me and sent back to Old Bridge for filing has been slowed down. I am still hopeful that it can be completed by Friday, but, in the event that the process is not completed, I am asking now, *nunc pro tunc*, for a one-week extension of the filing deadline from December 23 to December 30, 2005.

Under the terms of his bail, Mr. Gill who resides in Connecticut, is permitted to travel within Connecticut, New York State and New Jersey. However, he is subject to electronic monitoring until the property is posted. In the event that the property is not posted by Friday, I am requesting that his electronic monitoring be temporarily suspended from Friday, December 23, at noon until Monday, December 26 at 3:00 p.m. so that Mr. Gill can travel to New Jersey and spend the Christmas weekend with his parents at their home in Old Bridge, New Jersey.

Honorable Allyne R. Ross

December 21, 2005

I have spoken personally with both AUSA Scott Morvillo and Pre-Trial Services Officer Wilfredo Duran (of the New Haven branch of the U.S. District Court for the District of Connecticut) and both have informed me that they have no objection to these applications.

Accordingly, it is respectfully requested that the time within which Mr. Gill must post the property to secure his bail bond be extended from December 23 to December 20, 2005 and, in the event the property is not posted by December 23, 2005, that Mr. Gill be granted a temporary suspension of his electronic monitoring so that he can travel to Old Bridge, New Jersey and stay with his parents for the Christmas weekend, leaving his home in New Haven on Friday, December 23 at noon and returning there by Monday, December 26, 2005 at 3:00 p.m.

Very truly yours,



Joyce C. London

cc.: AUSA Scott Morvillo (By Fax: 718: 254-6327)
PTSO's Wilfredo Duran and Carmelo Madina (By Fax: 203: 773-2200)